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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

19 RECORDINGS LIMITED)	
)	Case No. 14-CV-1056 (RA)(GWG)
Plaintiff,)	
v.)	NOTICE OF PLAINTIFF’S CROSS-
)	MOTION FOR PARTIAL JUDGMENT
SONY MUSIC ENTERTAINMENT,)	ON THE PLEADINGS
)	<u>DEMAND FOR JURY TRIAL</u>
Defendant.)	

PLEASE TAKE NOTICE that, upon the accompanying Response in Opposition to Defendant’s Motion for Partial Judgment on the Pleadings and Cross-Motion for Partial Judgment on the Pleadings, and the Declaration of Richard S. Busch with exhibits in support, Plaintiff 19 Recordings Limited (“19”), by its attorneys, will move this Court, before the Honorable Ronnie Abrams, United States District Court Judge, at the United States Courthouse, 40 Foley Square, Courtroom 1506, New York, New York, as soon as counsel may be heard, for

an order pursuant to Rule 12(c) of the Federal Rules of Civil Procedure (i) granting judgment in 19's favor on 19's breach-of-contract claim against Defendant Sony Music Entertainment ("Sony") concerning royalties generated on Sony's receipts from the exploitation of 19's master recordings under the streaming agreements previously submitted to the Court by Sony on June 26, 2015, as Exhibits 1 through 19 to the Declaration of Stephanie Brooks, and the additional streaming agreements submitted to the Court contemporaneously herewith as Exhibits 3 through 41 to the Declaration of Richard S. Busch; and (ii) for such other and further relief as the Court deems just and proper.

Dated: September 16, 2015

Respectfully submitted,

By: /s/Richard S. Busch
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September, 2015, the preceding document was sent by Electronic Mail and Federal Express to:

Jonathan M. Sperling, Esq.
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/s/Richard S. Busch